

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION

Roger Cleveland Golf Company, Inc.)	C.A. No.: 2:09-cv-02119-MBS
)	
Plaintiff,)	
vs.)	
)	ANSWER OF DEFENDANT
Christopher Prince, Sheldon Shelley, Prince))	BRIGHT BUILDERS, INC.
Distribution, LLC, and Bright Builders, Inc.,))	
)	
Defendants.)	
_____)	

Defendant Bright Builders, Inc. (“Bright”) answers the Complaint of Plaintiff Roger Cleveland Golf Company, Inc., (“Plaintiff”), as follows:

A. Answer to Allegations of Plaintiff’s Complaint

Defendant denies each and every allegation of the Complaint that is not specifically admitted herein and demands strict proof hereof.

1. Defendant is without information sufficient to admit or deny the allegation contained within Paragraph 1 and therefore denies same and demands strict proof thereof.
2. Defendant is without information sufficient to admit or deny the allegations contained in Paragraph 2, and therefore denies the same.
3. Defendant denies the allegations contained in paragraph 3.
4. Defendant denies the allegations of paragraph 4.
5. Defendant denies the allegations of paragraph 5.
6. Defendant is without information sufficient to admit or deny the allegations of paragraph 6, and therefore denies the same.

7. Defendant is without information sufficient to admit or deny the allegations of paragraph 7, and therefore denies the same.

8. Defendant is without information sufficient to admit or deny the allegations of paragraph 8, and therefore denies the same.

9. Defendant is without information sufficient to admit or deny the allegations of paragraph 9, and therefore denies the same.

10. Defendant is without information sufficient to admit or deny the allegations of paragraph 10, and therefore denies the same.

11. Defendant denies the allegations of paragraph 11.

12. Defendant is without information sufficient to admit or deny the allegations contained in paragraphs 12 through 18, and there denies the same and demand strict proof thereof.

13. Defendant denies the allegations of paragraph 19.

14. Defendant denies the allegations of paragraph 20.

15. Defendant denies the allegations contained in paragraph 21.

16. Upon information and belief, Defendant denies the allegations of paragraph 22.

17. Defendant denies the allegations contained in paragraph 23.

18. Defendant denies the allegations of paragraph 24.

19. Defendant denies the allegations of paragraph 25.

20. Defendant lacks information sufficient to form a belief as to the allegations in paragraph 26, and therefore denies the same.

21. Defendant denies the allegations of paragraph 27.

22. Defendant denies the allegations of paragraph 28.
23. Defendant denies the allegations contained in paragraph 29
24. Defendant denies the allegations contained in paragraph 30.
25. Defendant lacks the knowledge or information sufficient to admit or deny the allegations of paragraph 31, and therefore denies the same and demands strict proof thereof.
26. Defendant lacks the knowledge or information sufficient to admit or deny allegations of paragraphs 32 through 38, and therefore denies the same.
27. Defendant denies the allegations of paragraph 39.
28. Defendant lacks the knowledge or information sufficient to admit or deny the allegations of paragraph 40, and therefore denies the same.
29. Defendant denies the allegations of paragraph 41.
30. Defendant neither admits or denies paragraph 42, as no response is required. Should a response be required, the same is therefore denied.
31. Defendant lacks the knowledge or information to either admit or deny number 43 through 48, and therefore denies the same.
32. Defendant neither admits or denies paragraph 49, as no response is required. Should a response be require, the same is denied.
33. Defendant lacks the knowledge or information sufficient to form a belief as to the allegations of paragraphs 50 through 53, and therefore denies the same.
34. Defendant neither admits nor denies paragraph 54, as no response is required. Should a response be required, it is denied.
35. Defendant denies the allegations contained in paragraphs 55 through 62.

36. Defendant neither admits nor denies number 63, as it requires no response.
Should a response be required, Defendant denies the same.

37. Defendant denies the allegations contained in paragraphs 64, 65, and 66.

38. Defendant neither admits nor denies number 67, as it requires no response.
Should a response be required, Defendant denies the same.

39. Defendant lacks the knowledge or information to admit or deny the
allegations contained in paragraph 68, and therefore denies the same.

40. Defendant denies the allegations of paragraph 69.

41. Defendant denies the allegations of paragraph 70.

42. Defendant denies the allegations contained in paragraph 71.

43. Defendant neither admits nor denies number 72, as it requires no response.
Should a response be required, Defendant denies the same.

44. Defendant denies the allegations contained in paragraphs 73, 74, 75, and
76.

Defendant reserves the right to amend and supplement its Answer to include any
and all other Affirmative Defenses revealed during the process of Discovery.

s/ Paul J. Doolittle

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing has been served upon all parties of counsel by regular mail this 11th day of May, 2010, and electronically submitted to the Court.

s/ Paul Doolittle

May 11, 2010
Mt. Pleasant, South Carolina